

JUDGE CASTILLE

17 CV 703

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

DAVID ROEMER,

Plaintiff

-against-

ATTORNEY GRIEVANCE COMMITTEE AND JANE E. BOOTH,  
Defendants.

- 1) At all times, herein mentioned, the plaintiff is a resident of Brooklyn, New York.
- 2) The Attorney Grievance Committee (Supreme Court Appellate Division, First Judicial Department) is at 61 Broadway, 2nd Floor, New York, NY 10006. Jane E. Booth, General Counsel of Columbia University, and has an office at 412 Low Memorial Library, 535 West 116th St., New York, NY 10027.
- 3) The jurisdiction of this court is invoked pursuant to the 1st and 14th amendment to the Constitution of the United States of America. The plaintiff seeks injunctive relief for the deprivation of the plaintiff's right to free speech and for violations of the Establishment Clause.
- 4) On 9/15/16, the plaintiff sent an email to the University Chaplain of Columbia U. with an offer to give a lecture/lesson on the cosmological argument for God's existence. On 10/13/16, Jane Booth sent the plaintiff a letter threatening legal action if the plaintiff contacted any student or member of the faculty of Columbia University about this offer. On 10/18/16, the plaintiff filed an ethics complaint against Jane Booth with the Attorney Grievance Committee. On 1/5/17, the Attorney Grievance Committee sent the plaintiff a letter stating that the plaintiff's exhibits and complaint failed to indicate any violation of the New York Rules of Professional Conduct.
- 5) On 1/11/17, the plaintiff sent an email to Jane Booth giving reasons why the plaintiff's proposed lecture/lesson had social value and why Jane Booth's threats violated the academic freedom of the Columbia University community.

6) The science establishment in the United States disseminates the misinformation that human beings evolved from animals. The truth is that *homo sapiens* evolved from animals. *Homo sapiens* are hypothetical creatures that lack free will and the conscious knowledge of humans as opposed to the sense knowledge of animals.<sup>1</sup>

7) Many philosophers in the United States disseminate misinformation about the cosmological argument for God's existence. The only rational cosmological argument is based on the scientific fact that human beings did not evolve from animals. This argument assumes that the universe is intelligible and that human beings are finite beings. These assumptions mean an infinite being (God) exists.<sup>2</sup>

8) The above misinformation has the effect of promoting the religion known as *humanism*. Upon information and belief, Jane Booth and the Attorney Grievance Committee are violating the Establishment Clause by unlawfully preventing the plaintiff from contradicting the misinformation in 6) and 7).

9) Wherefore, the plaintiff is asking this court to issue an injunction that will protect the plaintiff's right to free speech and enforce the Establishment Clause.

1) And certain properties of the human brain distinguish our species from all other animals. The human brain is, after all, the only known collection of matter that tries to understand itself. To most biologists, the brain and the mind are one and the same; understand how the brain is organized and how it works, and we'll understand such mindful functions as abstract thought and feelings. Some philosophers are less comfortable with this mechanistic view of mind, finding Descartes' concept of a mind-body duality more attractive. (Niel Campbell and Jane Reece, *Biology*, 4th edition, p.776)

2) <https://plato.stanford.edu/entries/cosmological-argument>

Signed,



David Roemer, pro se

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